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8 *Attorney for Plaintiff*

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10 **UNITED STATES DISTRICT COURT**  
11  
12 **DISTRICT OF NEVADA**

13 **ALEJANDRO ONETO-ALONSO,**  
14 individually;

15 Plaintiff,

16 Case No.: 2:19-cv-0639-JAD-BNW

17 vs.

18 **FIRST PRIME MANAGEMENT INC., A**  
19 Nevada Corporation; **DANIEL MAZA-**  
20 **NORIEGA**, individually; **DOES 1-10**; and  
21 **ROES A-Z**;

22 Defendants.

23 **STIPULATION TO STAY PROCEEDINGS**

24 The parties to the above-referenced action respectfully request that the Court approve  
25 this stipulation seeking to stay this action for twenty-one (21) days or until October 25, 2019.

26 In support of this stipulation, the parties rely upon the following:

27 1. Plaintiff Alejandro-Oneto is represented by Paul S. Padda, Esq.  
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2. Defendant First Prime Management, Inc. is represented by Patrick W. Kang, Esq.  
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3. Mr. Kang has notified Plaintiff's counsel that he will shortly be filing an appearance  
30 for Defendant Daniel Maza-Noriega which should moot the request for a Clerk's  
31 Default.

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4. The parties concur that a prior agreement between the parties governs the scope of their dispute and that this matter should be referred to arbitration.
5. However, the parties are also in agreement that this matter should be stayed for a period of 21 days (October 25, 2019) until they can decide upon an arbitrator. If the parties cannot agree upon an arbitrator, then they will request that the Court assist in the selection of an arbitrator.
6. In light of the foregoing, the parties respectfully request that the Court stay this proceeding for 21 days pending the agreement to select an arbitrator. If the parties can agree upon an arbitrator, they will file a stipulation of dismissal within 21 days. If the parties are unable to agree upon an arbitrator, they will file a status report within 21 days requesting a status conference with the Court to help select an arbitrator.

Respectfully submitted,

/s/ Patrick W. Kang

/s/ Paul S. Padda

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Patrick W. Kang, Esq.

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Paul S. Padda, Esq.

Counsel for First Prime Management Inc.

**Counsel for Plaintiff**

Dated: October 4, 2019

Dated: October 4, 2019

## IT IS SO ORDERED:

**The Court having reviewed the parties' stipulation to stay proceedings pending the selection of an arbitrator, it is hereby ordered that the stipulation is approved. This matter is stayed until October 25, 2019.**

## United States Magistrate Judge

**DATED:** 10/8/19

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this day, October 4, 2019, I caused to be served a copy of the foregoing document via the Court's CM/ECF system.

Paul S. Padda

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